

**Exhibit D**  
**(Filed Under Seal)**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CASE: 15-cv-07433-RWS

VIRGINIA GIUFFRE,  
  
Plaintiff,

v.

GHISLAINE MAXWELL,  
  
Defendant.

\_\_\_\_\_ /

VIDEOTAPED DEPOSITION OF TONY FIGUEROA

Volume 1 of 2

Pages 1 - 157

Taken at the Instance of the Defendant

DATE: Friday, June 24, 2016

TIME: Commenced: 8:59 a.m.  
Concluded: 1:22 p.m.

PLACE: Southern Reporting Company  
B. Paul Katz Professional Center  
(SunTrust Building)  
One Florida Park Drive South  
Suite 214  
Palm Coast, Florida 32137

REPORTED BY: LEANNE W. FITZGERALD, FPR  
Florida Professional Reporter  
Court Reporter and Notary Public

1 APPEARANCE OF COUNSEL

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4 ON BEHALF OF THE PLAINTIFF:

5 BRADLEY J. EDWARDS, Esquire  
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9

10 ON BEHALF OF THE DEFENDANT:

11 LAURA A. MENNINGER, Esquire  
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16 Also appearing: Jenny Martin, Videographer from Abel  
17 Virginia Giuffre, Plaintiff

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## 1 CERTIFICATE OF OATH

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3 STATE OF FLORIDA )

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4 COUNTY OF FLAGLER )

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7 I, the undersigned authority, certify that TONY  
8 FIGUEROA personally appeared before me on  
9 June 28, 2016, and was duly sworn.

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11 WITNESS my hand and official seal this 5th day  
12 of July, 2016.

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20 Leanne W. Fitzgerald  
21 Notary Public - State of Florida  
My Commission No. FF060921  
Expires: February 8, 2018

22 Digital Certificate Authenticated  
23 By Symantec

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1 CERTIFICATE OF REPORTER

2 STATE OF FLORIDA )  
3 )  
4 COUNTY OF VOLUSIA )

5  
6  
7 I, Leanne W. Fitzgerald, Court Reporter, do  
8 hereby certify that I was authorized to and did  
9 stenographically report the deposition of TONY  
FIGUEROA; and that the foregoing transcript is a  
true record of my stenographic notes.

10 I further certify that I am not a relative,  
11 employee, attorney, or counsel of any of the  
12 parties, nor am I a relative or employee of any of  
the parties' attorneys or counsel connected with the  
action, nor am I financially interested in the  
action.

13 Dated this 5th day of July, 2016.

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20 \_\_\_\_\_  
Leanne W. Fitzgerald, FPR  
Florida Professional Reporter  
21  
22 Digital Certificate Authenticated  
By Symantec

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